

To: Nam, Ed[nam.ed@epa.gov]; Breneman, Sara[breneman.sara@epa.gov]; Marshall, Sarah[marshall.sarah@epa.gov]; Miller, Patrick[miller.patrick@epa.gov]
Cc: Colledge, Michelle (ATSDR/DCHI/CB)[mna9@cdc.gov]; Smith, Molly[Smith.Molly@epa.gov]; Nelson, Leverett[nelson.leverett@epa.gov]; Furey, Eileen[furey.eileen@epa.gov]; Cantello, Nicole[cantello.nicole@epa.gov]; Richard Gillig[rig4@cdc.gov]
From: Johnson, Mark
Sent: Fri 10/13/2017 5:53:16 PM
Subject: RE: ATSDR Statement regarding the use of the ATSDR Chronic MRL

Ed

The only public statement we could cite is what is contained in our 2012 ATSDR Manganese Toxicological Profile document (<https://www.atsdr.cdc.gov/ToxProfiles/tp151.pdf>). The following statement appears on p.22, with my bolding of the relevant text:

MRL values for acute or intermediate durations based on animal studies were not derived, because an MRL based on animal data would be lower than the proposed chronic-duration inhalation MRL that is based on effects observed in humans. It is uncertain if this is due to species differences in susceptibility to the neurotoxic properties of inhaled manganese or to the testing of humans with sensitive neurobehavioral tests that have not been applied to animals following inhalation exposures to manganese. **It is expected that the chronic MRL for inhaled inorganic manganese would provide protection for intermediate-duration exposure scenarios.** The MRL is based on an analysis of dose-response data for subtle neurological deficits in occupationally exposed workers with durations of employment from about 5 to 24 years (see Appendix A); the average duration of employment in workers in the principal study was 5.3 years.

Let me know if you have any further questions.

Mark

Mark D. Johnson, PhD, DABT

Regional Director/Toxicologist

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From: Nam, Ed

Sent: Friday, October 13, 2017 11:07 AM

To: Johnson, Mark <johnson.mark@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Marshall, Sarah <marshall.sarah@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>

Cc: Colledge, Michelle (ATSDR/DCHI/CB) <mna9@cdc.gov>; Smith, Molly <Smith.Molly@epa.gov>; Nelson, Leverett <nelson.leverett@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>; Cantello, Nicole <cantello.nicole@epa.gov>

Subject: RE: ATSDR Statement regarding the use of the ATSDR Chronic MRL

Mark,

Thanks for the rapid responses, and for continuing to move the report forward. I have one more question at this time. I realize that if we release this statement, it will trigger many more questions. I know that we are still be waiting on the health consultation, but is there any way that you can release any other supporting documentation that is supportive of this statement (perhaps on ATSDR's website)?

Thanks,

-Ed

From: Johnson, Mark

Sent: Friday, October 06, 2017 8:58 AM

To: Nam, Ed <nam.ed@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Marshall, Sarah <marshall.sarah@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>

Cc: Colledge, Michelle (ATSDR/DCHI/CB) <mna9@cdc.gov>; Smith, Molly <Smith.Molly@epa.gov>; Nelson, Leverett <nelson.leverett@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>

Subject: Re: ATSDR Statement regarding the use of the ATSDR Chronic MRL

Ed

To address your questions:

- You mentioned concurring with DCHI - I just wanted to clarify that there was no prior statement from DCHI.

The statement is intended to reflect that our Division of Toxicology and Human Health Sciences (DTHHS), which develops the MRL values that our Division (DCHI) uses, agrees with our proposal to use the chronic MRL for shorter term exposures. This is the first use of this statement for a site investigation.

- Is this the final statement before ATSDR publishes the health consultation?

This statement summarizes the approach that we will be taking in the health consultation, and represents an agency consensus. We wanted to provide that approach to EPA at this time to support the regulatory actions that are being taken.

- How will this statement be released? If it's an official email, can we cite it?

ATSDR considers the email that I sent you to be an official communication to EPA on this issue, which you can cite as needed. We do not intend for an public announcement of the statement, other than what we will explain in the Health Consultation that is being drafted. We have prepared an internal ATSDR document that provides the technical basis for the statement that we presented. It essentially is a further explanation of the basis for the development of the chronic MRL for manganese, that it is protective of shorter duration exposures. I am attaching our Toxicological Profile document for your reference. The relevant statement is on page 22.

Let me know if you have further questions.

Mark

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From: Nam, Ed

Sent: Thursday, October 5, 2017 4:15 PM

To: Johnson, Mark; Breneman, Sara; Marshall, Sarah; Miller, Patrick

Cc: Colledge, Michelle (ATSDR/DCHI/CB); Smith, Molly; Nelson, Leverett; Furey, Eileen

Subject: RE: ATSDR Statement regarding the use of the ATSDR Chronic MRL

Mark,

Thank you for putting out a brief statement before the full review of the data from the facility. The statement looks fine, though I guess I do have a few follow on questions:

- You mentioned concurring with DCHI - I just wanted to clarify that there was no prior statement from DCHI.
- Is this the final statement before ATSDR publishes the health consultation?
- How will this statement be released? If it's an official email, can we cite it?

Thanks

-Ed

-Edward Nam, PhD

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Phone 312-353-2192 nam.ed@epa.gov

From: Johnson, Mark

Sent: Thursday, October 05, 2017 3:30 PM

To: Nam, Ed <nam.ed@epa.gov>; Breneman, Sara <breneman.sara@epa.gov>; Marshall, Sarah <marshall.sarah@epa.gov>; Miller, Patrick <miller.patrick@epa.gov>

Cc: Colledge, Michelle (ATSDR/DCHI/CB) <mna9@cdc.gov>; Smith, Molly <Smith.Molly@epa.gov>

Subject: ATSDR Statement regarding the use of the ATSDR Chronic MRL

Ed

While we are preparing a review of the air monitoring data for the SH Bell facility in SE Chicago, we wanted to communicate a clear statement regarding the use of the ATSDR Chronic Inhalation MRL for manganese:

The Agency for Toxic Substances and Disease Registry's Division of Toxicology and Human Health Studies concurs with DCHI that it is appropriate to use the Chronic Inhalation MRL for manganese to evaluate the public health implications of environmental exposures to manganese over a period as short as 3 months.

Let me know if you have any questions regarding this statement or our policies.

Mark

Mark D. Johnson, PhD, DABT

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